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November 11, 2020

VIA ECF AND EMAIL

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Honorable Richard J. Sullivan
United States Circuit Judge
United States Court of Appeals for the Second Circuit
Daniel Patrick Moynihan United States Courthouse
500 Pearl St., Room 2530
New York, New York 10007

Re: *In re: Application of Gorsoan Limited, et al.*
(Case No. 17-cv-5912)

Dear Judge Sullivan:

Petitioners Gazprombank OJSC and Gorsoan Limited (together, “Gorsoan” or “Petitioners”) respectfully submit this letter in connection with the Court’s Order, dated November 7, 2020, directing Gorsoan to submit to the Court a list of the six banks and the specific assets and/or payment obligations that the Petitioners’ discovery requests concern. The following is a list of the subject six banks and, separately, assets and/or obligations about which Petitioners seek supplemental account or other discovery, in accordance with their letters dated October 13, 2020 (Doc. No. 78) and October 20, 2020 (Doc. No. 80).

Banks:

- Coutts
- HSBC
- Citibank
- Saanen
- JP Morgan Chase
- CIC

Specific Assets and/or Payment Obligations:

- Crystal Hotel
- Pralong Hotel

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- Societe des Hotels d'Altitudes, S.A. (SHA)

Specific Assets and/or Payment Obligations (continued):

- Petit Mas, St. Tropez, France
- 120 East 87 Street, RPH2A, New York, NY
- 12 East 82 Street, New York, NY
- 14 East 82 Street, New York, NY
- 34 East 62 Street, New York, NY
- 210 Meadow Lane, Southampton, NY
- 2170 Meadow Lane, Southampton, NY
- My Tzarina
- Chalet Santa Maria, Gstaadt, Switzerland
- 73 quai d'Orsay, Paris, France
- Rolls Royce Cloud 1
- Bentley
- Porsche
- Tuition payments for E. Bullock

Respectfully submitted,

/s/ Jonathan N. Halpern

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cc: ECF Counsel (via ECF)